Appendix B
Panel Comments to Submitted Questions

Belinda Collins

1. *What is the Interagency Committee on Standards Policy (ICSP) in the Federal Government doing to implement the National Standards Strategy? What are NIST's plans?*

OMB Circular A-119 directs government to participate in the development of voluntary consensus standards and to use these standards in regulatory, procurement and other policy activities. In 1995, the National Technology Transfer and Advancement Act codified the Circular, and assigned NIST the responsibility to coordinate federal, state, and local standards and conformity-assessment activities with those of the private sector.

The ICSP chaired by NIST, leads the Federal shift to greater use of voluntary standards. Federal agencies have significantly increased their use of voluntary standards; withdrawn competing federal standards; and refrained from developing agency-unique standards. The National Standards Strategy provides important guidance for the ICSP and will shape future activities, both domestically and in government-to-government activities at all levels.

NIST and the ICSP are acting to reverse the decline in federal participation in voluntary standards activities. Agencies that use voluntary standards for regulatory or procurement purposes must continue to contribute their expertise and resources to the development and implementation of these standards.

2. *What would Federal Agencies like to see happen as a result of the Strategy, recognizing it as a positive step forward that addresses many issues of concern to the entire standards community?*

The ICSP has encouraged its members to examine the Strategy and to implement it as appropriate. Elements of the Strategy now filter through to individual agencies to guide standards-related activities. For example, federal agencies can do a better job of leveraging their relationships with state and local governments to encourage greater use of voluntary consensus standards. This, in turn, would help to reduce regulatory redundancy and duplicative testing requirements.

Some of the tools for this type of streamlining already are in place. In 2000, NIST issued guidance on conformity assessment to federal agencies. This document advocates intergovernmental efforts at all levels to remove unnecessary testing and certification requirements, which would improve the efficiency and transparency of domestic and export markets. The NIST Memorandum of Understanding (MOU) with the National Cooperation for Laboratory Accreditation (NACLA) commits NIST to encourage agencies at all levels to accept the use of laboratory accreditation bodies recognized by NACLA, and to encourage U.S. accreditors to seek NACLA recognition. For its part, NACLA commits to follow accepted international guides and standards and to accommodate relevant government requirements in the implementation of its recognition program.

Principles outlined in the National Standards Strategy closely match regulatory and procurement initiatives under way in many agencies, and are helping agencies identify additional opportunities for improvement. For example, the Strategy underscores the importance of consumer participation in standards activitiesconsistent with the core principles of consensus, openness, balance, and transparency. In response and where appropriate, agencies may wish to initiate standards information and participation programs for consumer-focused activities.

3. *What else is NIST doing to implement the National Standards Strategy? How can the private sector—specifically ANSI—help Federal Agencies?*

NIST has created an excellent working relationship with ANSI that is reflected both in our Memorandum of Understanding (MOU) and a broad range of joint activities. The MOU formalized our mutual agreement on the need for a unified national approach to develop the best possible national and international standards. It also affirmed our shared commitment to enhance and strengthen the U.S. national voluntary consensus standards system.

NIST is incorporating the National Standards Strategy principles into its own standards strategy. One of our goals is to provide technical leadership for the nation's measurement and standards infrastructure. This includes fostering and technically assisting the development of high-quality standards needed by government and industry. This goal

also includes cooperating with ANSI to improve the effectiveness and responsiveness of the national system for developing voluntary standards. Another element is increasing our work with international bodies to ensure that U.S. standards are understood and accepted by our trading partners.

A major focus of the National Standards Strategy is on increasing U.S. presence and leverage in international standards activities, and working to improve processes internationally to more closely reflect U.S. principles and vision. Looking at the international scene, current resources do not appear adequate to support the level of effort required to achieve the goals laid out in the Strategy and therefore effectively champion U.S. technology interests. The U.S. effort in standardization internationally is significantly underfunded in contrast to our major trading partners, particularly Europe, and the U.S. voice has not always been heard. ANSI's ability to participate in the broad range of ISO and IEC committees continues to be hampered by inconsistent support from the private sector and government. The limited resources of industry and government are frequently insufficient to provide representation at the grass roots level in standards development, representation that is critical to ensure consistency of international standards with U.S. standards and practices. We strongly support full government participation in the funding of ANSI's international activities, to ensure that U.S. interests are fully represented in ISO and IEC.

Bob Noth

1.   *What has been the reaction of industry to the National Standards Strategy?*

I think the reaction of those companies that are already active in standards development has been very positive, with only few expressing comments that I would characterize as neutral. I know of only one trade association that expressed some concern with it. Because they were already participating effectively at the international level, they were concerned that having a public strategy might somehow undermine their particular effectiveness. I believe, however, that the vast majority of U.S. industry remains uninformed and unmoved.

This suggests the need for the strategy to be aggressively marketed and given "top billing" on the agendas of the major players in the standards community. ANSI's recent publication of their strategic plan built around the National Standards Strategy is an excellent framework to start with.

2.   *How does industry plan to implement the National Standards Strategy?*

Based on discussions I've been involved with in various forums where industries come together, I'd say that it will vary from sector to sector, some being more proactive and aggressive than others. We all heard presentations today about the different approaches to national and international standardization and Larry Eicher talked about the reasons for "standards wars." This was anticipated in the Strategy, which was designed to be "inclusive" of various industry approaches and timetables.

My own company, Deere, is reformatting its standards strategy to utilize the terminology of the National Standards Strategy and is working with industry colleagues through our trade associations, key SDOs and ANSI to identify, prioritize, and coordinate the tactical approaches that will best serve our industry. Once we get our act together within our own sector and sub-sectors, we intend to harmonize our approach with those of other related sectors, like Aerospace, Automotive, and Discrete Part Manufacturers, to take advantage of any "synergies" that might exist.

3.   *What advantages does industry see in having a National Standards Strategy that were not available before its publication?*

I can't answer for all industries but we at Deere and others I have talked to, see the National Standards Strategy as a cohesive force; a template for communication and coordination and a frame work for concentrated and concerted action on particular issues. We further believe the National Standards Strategy has an important function as a recruiting tool. There are too many non-participants that whether they recognize it or not, have a large stake in the game. It provides a common vocabulary that helps provide focus and promotes understanding. We could make those arguments before but we believe they now have more credibility because we can point to a top-level document that better defines standards importance to the national interest in commerce and trade as well as the roles of non-industry stakeholders.

Steve Oksala

1. *How can the U.S. standards "system" bring in all the consortia, fora, and other organizations?*

There are a variety of ways, depending on the needs of those organizations. Some may choose to become formally accredited once they understand the benefits; others may choose to partner with existing accredited organizations, either for administrative services or moving a standard to a higher level of consensus; still others would benefit by having an infrastructure in which they could interact with the formal process. Some, of course, do not need any of those things. Probably the biggest thing the "system" can do is to make sure that industry knows what is really available and how standards developers work, so that they can make knowledgeable choices about where to do technical harmonization.

2. *What's the biggest challenge to implementing the strategy?*

No question—it is getting the standards developers, companies, government, and everybody else to spend the energy to do better. The strategy is a framework for action. It provides ideas on how those with an interest in the standards "game" can move forward. It does not compel anyone to do anything, however, since it is rather like leading a horse to water.

3. *What would it mean to have more "coherence" in the system?*

At the very least, we should not be developing conflicting standards, or doing conflicting work, in ignorance. Ideally the various standards development efforts should be actively working together to make sure that our efforts are complementary.

4. *What should the U.S. Government do?*

First of all, participate. The U.S. government has a public interest role as well as a role as a very large purchaser of products that meet standards. It would also be useful, in my opinion, if the government recognized in a more positive way the ANSI system and the benefits it brings. At the very least, conformance to ANSI standards should mean presumption of conformance to documents such as the OMB Circular A-119.

5. *What can we do about the fact that the Europeans keep outvoting us?*

First of all, put in proposals that are good for everybody—then the Europeans will not vote no! However, where there are conflicts, get other countries to support our point of view by stressing that what we have is better for them. The ISO and IEC processes are based on representation by sovereign nations, and in the final analysis that won't change. Nor will the fact that there are a lot of countries in and near Europe whose best interests lie with supporting European standardization.

Gregory Saunders

1. *What makes the Department of Defense so interested in a National Standards Strategy?*

The Department of Defense has its own standards program and, through NATO and other alliances, its own interaction with other governments around the world. Yet DoD was not only an active participant in the development of the strategy, one of its high-level political appointees invited a delegation into the Pentagon to talk about the strategy and demonstrate support for it.

We live and operate in a global marketplace. It is vitally important to the Department that the U.S. industrial base be not just competitive, but be best in class. We recognize that industry is reliant on standards and so a standards strategy that helps to promote the competitiveness and leadership of U.S. industry helps the Department to gain access to the latest innovations so that we can maintain technological superiority. It also helps us to be able to support our troops from the commercial marketplace rather than from a manufacturing base that is unique to defense needs and is dependent on defense dollars for existence. Additionally, a national standards strategy, if properly implemented, should help the U.S. to maintain our economic security and that is a vital component of our national security.

2. *Now that the National Standards Strategy has been issued, what is the Department of Defense doing to implement it?*

The DoD continues to expand its use of non-Government standards. Through our MilSpec reform initiative, DoD has cancelled thousands of documents. In many cases, these have been turned over to the private sector where they really belong. The Department needs to devote resources to development and maintenance of standards that are unique to DoD needs, rather than on standards for products that are in regular use in the private sector. Addressing another of the points in the Strategy, we are working to develop sets of standardization case studies that will demonstrate the value of standardization. And, we are also working with ANSI and with various SDOs to evaluate and make recommendations to improve internal process and communications.

3. *At more than $100 Billion per year, the DoD is the largest single procurement organization in the country. Are there particular elements of the Strategy that you see as being more important of more urgent from a procurement point of view?*

There are a couple of areas of particular importance. As we continue to work toward greater reliance on non-government standards, the standards have to be written to address the needs of the Department. In some cases we can simply accept whatever the commercial world is doing, but in others we really need to participate on committees to be able to have our needs addressed. But with declining resources, we have fewer people to send to meetings and fewer dollars to send the people we do have. Therefore, process improvements are very important to us. Although we have an excellent voluntary standards system, we need to continually seek to improve the efficiency of the development process; through fewer "warm body" meetings; reduced overlap; and speed development by reducing the time from statement of need to publication of a standard.

Oliver Smoot

1. *What is the key to the success of the National Standards Strategy?*

It reflects and takes advantage of the distributed U.S. standards system. That is also the greatest challenge to our success, since it depends significantly on independent, voluntary, cooperative efforts.

2. *Is the National Standards Strategy all that the United States needs to do?*

No. Standards are important in themselves, and especially so in the United States where we basically have a small set of regulations and the rest is voluntary application of those standards that the producer thinks best for his product. But there is a significant amount of private sector as well as public sector conformity assessment in the United States and even more in the rest of the world. So, the needed complement to the National Standards Strategy is a National conformity Assessment Strategy. We hope, under Gerald Ritterbusch's leadership to accomplish that this year.

3. *What is ANSI's greatest challenge in doing its part to achieve the National Standards Strategy?*

ANSI needs to increase its base of support in the private sector through memberships and cooperative arrangements, so that is provides an active forum for discussing what we all need to do to accomplish the National Standards Strategy.

Jim Thomas

1. *How does the National Standards Strategy relate to the Technical Barriers to Trade (TBT) agreement on the important issue of international standardization?*

The TBT agreement states that, "Bodies operating with open, impartial and transparent procedures that afford an opportunity for consensus among all interested parties . . . contribute to prevent unnecessary obstacles to trade." Notably, an affiliation with a specific standards developer is not a requirement for the development of international standards. Within Annex 4, the WTO TBT Committee provides further clarity with regard to international standards by detailing a set of principles and procedures it considers important for international standards development. The principles listed are: transparency, openness, impartiality, effectiveness and relevance, and consideration of developing countries' concerns.

The National Standards Strategy is consistent with the TBT principles and procedures necessary for the development of international standards. First, it recognizes that the United States offers flexibility through multiple forums for the development of standards and that the affected stakeholders know the best forum to address their concerns. Second, the National Standards Strategy identifies the following principles as necessary for the development of international standards and urges U.S. leadership to implement these principles in whatever forum is utilized for standards development: consensus, openness, balance, transparency, due process, flexibility, timeliness and coherence. Finally, the National Standards Strategy urges provision of international education about the U.S. standards process, participation in standards development and consideration of international points of view, particularly from developing nations.

2.   *Will the National Standards Strategy help reduce overlapping and redundant standardization activities?*

If the National Standards Strategy is successfully implemented, and stakeholders are permitted to continue choosing the solution that best meets their respective needs, reduced overlap and conflict will be natural outcomes.

The National Standards Strategy identifies "coherence" or the avoidance of overlap or conflict, as one of the components of a successful standards process both nationally and internationally. In the statement of international vision the National Standards Strategy calls for one globally applied standard and one accepted test method and it acknowledges that from a national perspective, cooperative processes that include all stakeholders will lead to a unified and coordinated international position. The National Standards Strategy strategic initiatives that facilitate the reduction of overlap and redundancy include:

- Support the trend for government use of voluntary consensus standards

- Improve international processes to more closely reflect U.S. principles and vision and achieve the best standards for commerce and trade

- Facilitate the use of standards worldwide as a tool to meet regulatory requirements

- Demonstrate the value of U.S. technology, standards, and processes

- Enhance the process to ensure that customer needs for coherence are addressed

- Improve communications of needs as well as existing solutions to avoid overlap.

More importantly, the key determinants in a given standard's ability to be globally accepted and applied are/should be directly related to the standard's market relevance, technical currency, and responsiveness to innovation. If the market determines that an existing standard meets these criteria, the need for alternatives and duplicates is naturally minimized.

3.   *Do you envision significant changes in SDO process and business models based on the "Moving Forward" concepts contained in the National Standards Strategy?*

The National Standards Strategy recognizes ". . . no single standardization system can satisfy all needs." Due to this inherent diversity, the degree of change required will really depend on each developing organization. While the National Standards Strategy identified such strategic initiatives as consumer participation, improved international processes, and better processes for efficiency and coherence, it is essential for developers, on their own initiative, to regularly evaluate their process and business models for strategic and commercial reasons and to modify them accordingly.

With regard to processes, we, collectively as standards developers, are lucky. Today's technology affords SDOs the ability to reach out to more stakeholders than ever before and to do so efficiently and economically. Implementation of technology has become necessary as the community of affected participants becomes increasingly global, the resources available to conduct the often-voluntary standards development work decrease, and the demand for accelerated delivery increases. Today's technology facilitates participant outreach, economical draft distribution, timely collection of global input, accelerated publication, and worldwide dissemination of the finished product. Regarding changes to business models, it is safe to say that each organization has selected one. As there are a variety of standardization systems, so there are corresponding business models that support the respective organization with the generation of revenues from a variety of sources. What is most important is not that the National Standards Strategy necessitates a change to these business models, but that it allows the variety of business models to continue and does not diminish their ability to flourish.